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Admitted to Practice Law
in the State of New York

November 9, 2023

Via ECF

Hon. Lee G. Dunst, USMJ
United States District Court, EDNY
100 Federal Plaza
Central Islip, NY 11717

Re: Jonatan Barahona and Hector Hernandez v. Paradise Tree
Service & Landscape, Corp. and William Nieto
Venue: United States District Court, Eastern District of New York
Civil Action No.: 2:21-cv-05400 (GRB)(AYS)

Dear Judge Dunst:

Regarding the above matter, I represent the Defendants, Paradise Tree Service & Landscape, Corp. and William Nieto. I am hereby respectfully requesting that I be granted an extension of time to oppose and/or cross move against Plaintiff's Letter Motion, dated November 9, 2023. The allegations and relief requested in Plaintiffs' Counsel's Letter Motion, are drastic, but more importantly, it contains statements by Plaintiff's Counsel which are false and intentionally made to mislead this Court and damage Defendants and their Counsel. I will illustrate these contentions with documentary evidence, which is irrefutable. Defense Counsel will also show that Plaintiffs' counsel engaged in this practice on a prior occasion which was illustrated by Defendants' counsel, at that time.

I will also directly address the discovery and pre-trial order issues raised by Plaintiffs' Counsel. I respectfully request I be granted until on or before, Tuesday, November 14, 2023, or some other date determined by this court to oppose and/or cross-move regarding Plaintiffs' November 9, 2023 Letter Motion. Thank you for your consideration.

Respectfully submitted,

Glenn Ingoglia
Glenn J. Ingoglia

c.c.: Via ECF
Plaintiffs' Counsel
Steven J. Moser, Esq.